



DEPARTMENT OF THE NAVY
SOUTHWEST DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132-5190

N00296.000191
MOFFETT FIELD
SSIC NO. 5090.3

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Ser 06CH.AM/0386
April 10, 2001

Dr. Lynn Suer
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Subj: **SHUTDOWN OF THE WEST-SIDE AQUIFER TREATMENT SYSTEM DUE TO
EXCEEDANCE OF THE NPDES DISCHARGE LIMIT FOR ORGANICS MOFFETT
FEDERAL AIRFIELD, MOFFETT FIELD, CALIFORNIA**

Dear Dr. Suer:

In accordance with NPDES No. CAG912003, Order No. 99-051, Self-Monitoring Program, this formal notification is being provided to the Regional Water Quality Control Board (RWQCB) that the West-Side Aquifers Treatment System (WATS) located at Moffett Federal Airfield, Moffett Field, California has been shutdown for longer than 120 consecutive hours. The system was shutdown on March 29, 2001 at 1630 hours. This formal notification is a follow-up to the notification that was given to the RWQCB on April 2, 2001.

On March 26, 2001 at 1130 the analytical results from the March 1, 2001 NPDES sample event of the WATS were received. These results indicated a potential exceedance of acetone in the WATS effluent. Confirmation samples were taken on March 26, 2001. The analytical results from these samples, received March 28, 2001, confirmed that there was an exceedance of Acetone in the WATS effluent. Upon discussions with the RWQCB on March 28, 2001, it was determined that the WATS system would be shut down by the end of the day March 29, 2001 to allow collection of additional samples prior to shutdown. WATS shutdown occurred at 1630 on March 29, 2001.

The Navy is investigating several potential corrective actions. Currently the Navy is evaluating both the potential sources of the acetone as well as the treatment options to bring the system back into compliance. Process samples were taken on March 28 and 29, 2001. These results are being evaluated to assess whether the Acetone is being introduced to the system or is generated within the system. The Navy will then determine if the current system can be retrofitted to address the acetone or if additional treatment equipment is required. Assessment of front-end treatment or additional polishing will be considered. The Navy is concurrently researching acetone treatment technologies that are readily available in industry. Upon final determination of the corrective action, the Navy will perform the required testing and sampling activities as described in the Start up Phase Monitoring and Reporting requirements of the NPDES Self-Monitoring Program.

If it is determined that the existing system can be retrofitted to achieve compliance, it is anticipated that the WATS will be shut down for approximately 45 days with start-up activities commencing in mid-to-late May 2001. If the final corrective action requires additional treatment equipment, a longer shutdown time will be required due to equipment fabrication, delivery and installation.

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Upon selection of the corrective measure, a detailed schedule will be developed. This schedule will also include the anticipated NPDES modifications, reflecting the appropriate review and approval by the RWQCB. Once the corrective action has been put in place, the appropriate notifications shall be made prior to the Start-up Phase as required by the NPDES Self-Monitoring Program.

If you have questions or comments, please contact either Ms. Mary Parker or Ms. Andrea Muckerman in any of the following ways:

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Sincerely,



ANDREA MUCKERMAN
BRAC Environmental Coordinator,
By direction of the Commander

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